

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

JOHNCARLO A. LIGI, JR.

Debtor

JP MORGAN CHASE BANK, NATIONAL  
ASSOCIATION

Movant

v.

JOHNCARLO A. LIGI, JR., and CHARLES  
J. DEHART, III, CHAPTER 13 TRUSTEE

Respondents

Case No. 5-15-02421

Chapter 13

John J. Thomas, B.J.

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**DEBTOR'S OBJECTION TO CERTIFICATION OF DEFAULT**

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AND NOW, comes the Debtor herein by and through his attorney, Brian E. Manning Esquire, and files the following Objection to the Certification of Default and in support thereof alleges:

1. Debtor objects to the Certification of Default and believes he can become current on his mortgage at or prior to any hearing scheduled on this matter.

WHEREFORE, the Debtor respectfully requests that this Court enter an Order setting a hearing and granting the Debtor such other and further relief as the Court deems just and appropriate under the circumstances.

Respectfully Submitted  
**Law Offices of Brian E. Manning**  
/s/ Brian E. Manning  
Brian E. Manning, Esquire  
502 S. Blakely, St., Suite B  
Dunmore, PA 18512  
Tel. 570-558-1126  
Fax 866-559-9808  
[brianemanning@comcast.net](mailto:brianemanning@comcast.net)  
Attorney for the Debtor

Dated: January 17, 2017